

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SANFORD WOODY, individually and on
behalf of all other persons similarly-situated,

Plaintiff,

v.

Case No. 1:07-cv-08733-DBA

CVS CAREMARK CORPORATION,
d/b/a CVS, a Delaware Corporation

Defendant.

MOTION TO ADMIT COUNSEL *PRO HAC VICE*

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District
Courts for the Southern and Eastern Districts of New York, I, Fran L. Rudich,
member in good standing of the bar of this Court, hereby move for an Order
allowing the admission *pro hac vice* of:

Cyrus B. Mehri
Mehri & Skalet, PLLC
1250 Connecticut Ave., NW
Suite 300
Washington, DC 20036
Phone Number: 202-822-5100
Fax Number: 202-822-4997

Cyrus B. Mehri is a member in good standing of the Bar of the State of
Connecticut and the District of Columbia.

There are no pending disciplinary proceedings against Cyrus B. Mehri in any
State or Federal Court.

Dated: April 8, 2008

City, State: New York, NY

U.S. District Court
Southern District of New York
APR 16 11 3:23
S.D. N.Y.

647700
835-
APR 15 2008

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'F. Rudich', written over a horizontal line.

Fran L. Rudich (FR7577)
LOCKS LAW FIRM, PLLC
110 East 55th Street
12th Floor
New York, NY 10022

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Defendant.

**AFFIDAVIT OF FRAN L. RUDICH IN SUPPORT OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

Fran L. Rudich, being duly sworn, hereby deposes and says as follows:

1. I am Partner at Locks Law Firm, PLLC, and counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Cyrus B. Mehri as counsel *pro hac vice* to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in (full date). I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. Mr. Mehri is Partner at Mehri & Skalet, in Washington, D.C.
4. I have found Mr. Mehri to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
5. Accordingly, I am pleased to move the admission of Cyrus B. Mehri, *pro hac vice*.
6. I respectfully submit a proposed order granting the admission of Cyrus B. Mehri, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Cyrus B. Mehri, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.

Dated: April 8, 2008
City, State: Washington, DC

Notarized:

4/8/08

Jennifer Russell

Jennifer Russell
Notary Public State of New York
No. 01RU6126256
Qualified in New York County
Commission Expires May 2, 2008

Respectfully submitted,



Fran L. Rudich (FR7577)

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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Plaintiff,

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Case No. 1:07-cv-08733-DBA

CVS CAREMARK CORPORATION,
d/b/a CVS, a Delaware Corporation

Defendant.

**[PROPOSED] ORDER FOR ADMISSION *PRO HAC VICE* ON WRITTEN
MOTION**

Upon the motion of Fran L. Rudich, attorney for Sanford Woody and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Cyrus B. Mehri
Mehri & Skalet, PLLC
1250 Connecticut Ave., NW
Suite 300
Washington, DC 20036
Phone Number: 202-822-5100
Fax Number: 202-822-4997

is admitted to practice *pro hac vice* as counsel for Sanford Woody in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subjected to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:

City, State: Washington, D.C.

Magistrate Judge Debra C. Freeman



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

CYRUS MEHRI

was on the 3RD day of NOVEMBER, 1989
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on March
12, 2008.

GARLAND PINKSTON, JR., CLERK

By: *W. Charles*
Deputy Clerk



State of Connecticut
Supreme Court

I, Michèle T. Angers, Chief Clerk of the Supreme Court of the State of Connecticut and keeper of the Seal thereof,

Do hereby certify that, in the Superior Court at **Hartford**
on the **ninth** *, day of* **December**
1988

Cyrus B. Mehri

of

Washington, D. C.

having been examined and found duly qualified, was sworn as an attorney and admitted to practice before all the courts of this state, and that said attorney is a member in good standing of the Bar of this State pursuant to Practice Book §2-65.

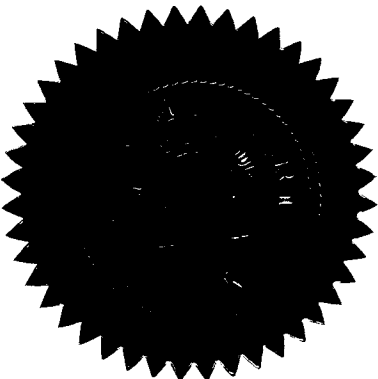
In Testimony Whereof, I have hereunto set my hand and affix the Seal of the Supreme Court of the State of Connecticut, at Hartford, this **fourth** *day of*

April **, 20 08**

A handwritten signature in cursive script that reads "Michèle T. Angers".

Michèle T. Angers

Chief Clerk



CERTIFICATION OF SERVICE

Woody v. CVS Caremark Corporation
United States District Court
Southern District of New York
Civil Action No. 07 cv 8733 - DBA

I am over the age of 18 years, employed in the county of New York, and not a party to the within action; my business address is 110 East 55th Street, New York, NY 10022.

On April 14, 2008, I caused to be served the within:

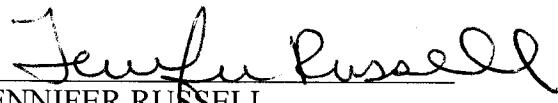
- 1. Motion to Admit Counsel Pro Hac Vice, Affidavit of Fran L. Rudich in Support of Motion to Admit Counsel Pro Hac Vice for Anna M. Poh and certificates of good standing;**
- 2. Motion to Admit Counsel Pro Hac Vice, Affidavit of Fran L. Rudich in Support of Motion to Admit Counsel Pro Hac Vice for Ellen Eardley and certificates of good standing;**
- 3. Motion to Admit Counsel Pro Hac Vice, Affidavit of Fran L. Rudich in Support of Motion to Admit Counsel Pro Hac Vice for Cyrus B. Mehri and certificates of good standing;**

on the parties in said action via DHL to said attorneys listed below:

Aimee B. Florin Orrick, Herrington & Sutcliffe LLP 666 Fifth Avenue New York, NY 10103	Heather Ann Glatter Orrick, Herrington & Sutcliffe, L.L.P. 666 Fifth Avenue New York, NY 10103-0001	James J. Swartz Ashe, Rafuse & Hill, L.L.P. 1355 Peachtree Street, N.E. Suite 500 Atlanta, GA 30309-3232
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I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 14, 2008 at New York, New York.


JENNIFER RUSSELL